EPA and Administrator Wheeler: *Do More to Reduce Lead at the Tap!*

The U.S. Environmental Protection Agency (EPA) has proposed revisions to the Safe Drinking Water Act's "Lead and Copper Rule." The goal of the Lead and Copper Rule (LCR) is to reduce lead in drinking water provided by regulated water systems.

Increasing public concern has created momentum for tackling lead at the tap. ***It's therefore disappointing that EPA chose not to require full replacement of lead service lines — the largest source of lead in drinking water — and stopped short of other measures to reduce exposure.***

EPA's proposal includes changes in six major aspects of this complex regulation. Some have been under discussion since EPA undertook this process more than a decade ago. Some are informed by newer information about lead health effects and about the occurrence of lead in drinking water across the country.

EPA's proposed revisions to the LCR take place against the backdrop of the Trump administration's initiatives that put polluter interests over health and the environment and amidst ongoing rollbacks in Clean Water Act programs that reduce pollution and protect drinking water sources.

WHAT ARE THE HEALTH EFFECTS OF LEAD?

Children under 6 are the most vulnerable to lead exposure. Even low levels of lead in the blood of children can result in behavior and learning problems, lower IQ and hyperactivity, and other health effects. Adults exposed to lead can suffer from cardiovascular effects, increased blood pressure, decreased kidney function, and reproductive problems (in both men and women). During pregnancy and nursing, lead can be released, exposing the fetus or the breastfeeding infant to lead.

WHERE DOES LEAD COME FROM?

Sources of lead include lead-based paint, contaminated soil, everyday products, food and beverages, and drinking water. Drinking water is rarely the largest source of exposure to lead. However, given that even low doses of lead affect people's health — especially children under 6 — reducing lead at the tap has important public health benefits.

EPA Should Do More to Address Lead Service Lines

GET THE LEAD OUT: Lead service lines are the pipes that deliver water from the large water main to the building. Where lead service lines are present, they are the largest source of lead in tap water.

Communities nationwide are considering full lead service line replacement. In 2018, Michigan finalized its own version of the Lead and Copper Rule which requires full replacement of lead service lines within 20 years. Instead of following this bold example, EPA stopped short of articulating a vision of water distribution systems free of this largest source of lead at the tap. Using lead service lines — a practice that began over 100 years ago — was a bad choice and it's time to correct it. ***EPA should make the right choice now and require all lead service lines to be replaced.***

PROHIBIT RISKY PRACTICES: A "partial replacement" is when water systems replace only the part of the service line under public property." This has been a common practice during routine maintenance, when emergency repairs are needed, and when water systems are required to begin replacing lead service lines after finding elevated lead levels. Researchers have found that partial replacements result in elevated lead levels over a long period of time and the Michigan LCR allows them only in emergency repairs. While EPA proposes to remove incentives for partial replacements when water systems are required to begin replacements after finding elevated lead levels, they did not take other steps to reduce this risky practice. ***EPA should prohibit partial lead service line replacements.***

REPLACE SERVICE LINES FASTER: When water systems find elevated lead levels, the existing Rule requires them to replace lead service lines at a rate of 7% annually. EPA proposes to improve several aspects of these replacement programs, but has reduced the annual percentage to 3%. EPA should not reduce the percentage of pipes required to be replaced. Instead, ***EPA should speed up replacement rates where elevated lead levels are found.***

Over for more about EPA's proposed LCR revisions and how to comment ►

More on EPA's Proposed Revisions to the Lead and Copper Rule:

EPA has proposed revisions to 12 key aspects of this complex regulation. You can find all of the materials at ***www.epa.gov/ground-water-and-drinking-water/proposed-revisions-lead-and-copper-rule***. Highlights include:

Lead Service Line Inventory: EPA is proposing to require all regulated water systems to compile a lead service line inventory that must be submitted to the State agency responsible for implementing Safe Drinking Water Act regulations and be made available to the public. Several states now require inventories. Knowing where lead service lines are, including any partial lines under the customer's property, is important for effective replacement plans, for setting up monitoring programs and for protecting vulnerable populations including children under 6. ***EPA must add lead piping materials that often connect service lines to the main, including "goosenecks" and "pigtails," to the proposed regulatory definition of lead service lines. EPA's proposal offers no justification for excluding these potential sources of lead at the tap from the definition of lead service line.***

Monitoring Requirements: Tap sampling is a key part of the Lead and Copper Rule's requirements. The sampling is done at targeted sites using methods intended to find lead in order to assess whether corrosion is occurring. EPA's proposal updates and clarifies the procedures that must be used. It also requires all sampling results to be publicly available within 60 days of the end of the monitoring period. ***Clarifying the process for selecting sites for sampling and for exactly how to take the samples is important because the current LCR is less clear, leading to concerns that some water systems are using sites and procedures that are not consistent and that could result in obscuring potential lead problems.***

Public Education: EPA is updating and expanding requirements outreach to customers and the public about lead in water. New requirements for water systems include notifying customers that they have a lead service line or a line of unknown material after the initial newly require inventory is complete. If any individual tap sample exceeds 15 parts per billion, water systems must notify consumers at the site within 24 hours. ***EPA should strengthen requirements and provide guidance to ensure that water systems reach the people actually residing the house and consuming the water. While house or building owners might pay the bill and be the water systems' "customers," outreach needs to include the actual consumers as well.***

Tell EPA Administrator Wheeler: *EPA Must Do More to Reduce Lead at the Tap*

Join us in making comments to the docket at ***cleanwater.org/LCRComment***

SAMPLE COMMENT ►

Docket ID No. EPA-HQ-OW-2017-0300

Dear Administrator Wheeler,

I urge you to address deficiencies in the Proposed Lead and Copper Rule Revisions. We know how to reduce lead at the tap, and now is the time to do everything we can to get lead out of contact with our drinking water. I especially urge you to:

- Require all water systems to fully replace all lead service lines within a specified timeline
- Prohibit partial lead service line replacements, which put people's health at risk and are inefficient
- Water systems with elevated lead levels should be required to replace lead service lines at a rate of at least 7%.

Please make sure that the Lead and Copper Rule is effective and visionary, and that EPA and States have the resources to robustly implement and enforce the program.